

Annual 47 CFR § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2018

1. Date filed: 2/15/19
2. Name of company(s) covered by this certification: Paul Bunyan Rural Telephone Cooperative
3. Form 499 Filer ID: 804129
4. Name of signatory: Christie Turn
5. Title of signatory: Customer Service Manager
6. Certification:

I, Christie Turn, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 CFR § 64.2001 *et seq.*

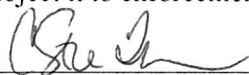
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed _____



Attachments: Accompanying Statement explaining CPNI procedures
 Explanation of actions taken against data brokers (if applicable)
 Summary of customer complaints (if applicable)



The operating procedures of Paul Bunyan Rural Telephone Cooperative ensure compliance with the FCC's CPNI Rules. Our procedures are as follows:

Marketing

Our company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Each customer's record contains a designation identifying whether or not we have obtained, through the processes permitted by the FCC's rules, the customer's approval to use, disclose or permit access to his or her CPNI.

Our company accesses and uses a customer's CPNI to market our own communication-related services (outside a customer's current relationship) only after the customer's Opt-Out consent has been obtained in compliance with FCC Rule 64.2008, and which consent has not been revoked by the customer. Every two years our company (a) provides a notice of customers' rights to restrict use and disclosure of, and access to, their CPNI, in compliance with FCC Rule 64.2008, and (b) solicits Opt Out consent for the use of the customer CPNI, in compliance with FCC Rule 64.2008, to each customer who has given Opt Out consent.

CPNI Safeguards

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees. Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-office visit. Our company does not disclose CDR records over the phone. A customer must come to our office and present valid photo identification in order to gain this information.

Our company has established password protection for customers' online accounts. Our company also includes terms specifying the confidentiality and use of CPNI in its contract with business customers that are served by a dedicated account representative.

Our company notifies a customer immediately of changes in: a customer's incorrect response to security questions, change of address of record, or an online account change.



CPNI Recordkeeping and Reporting

Our company maintains a record of our own marketing campaigns that use customer CPNI. We maintain these records for at least one year.

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the US Secret Service and the FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after seven business days following notification of the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses for at least two years.

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CPNI BREACH

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Name	Customer	Breach Date	Breach User	Breach Number
BATTERY WHOLESALE OUTLET	53733	06/20/2018	Christie Turn	1
Breach Comments:	Customer called to verify that his phone number was being forwarded to another number. We confirmed the information and told him what number it was being forwarded to without verifying who the customer was by asking CPNI questions. This was done by Melinda and I retrained her. ckt			
Non Reportable Comments:				
Reportable Comments:	Customer called to verify that his phone number was being forwarded to another number. We confirmed the information and told him what number it was being forwarded to without verifying who the customer was by asking CPNI questions.			

Total Number Of Records: 1